



**FEDERAL ELECTION COMMISSION**  
**Washington, DC 20463**

**October 17, 1997**

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

David F. Fasi, Esq.  
Winer & Meheula  
Pali Palms Plaza  
970 North Kalaheo Ave., Suite A-300  
Kailua, Hawaii 96734

**RE: MUR 4594**  
**Frank F. Fasi**

**Dear Mr. Fasi:**

On December 6, 1996, your client, Frank F. Fasi, was notified that the Federal Election Commission had found reason to believe your clients violated 2 U.S.C. § 441e, a provision of the Federal Election Campaign Act of 1971, as amended.

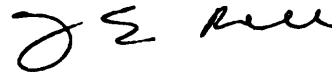
Pursuant to its investigation of this matter, the Commission has issued the attached subpoena and order requiring Frank F. Fasi to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that you submit all answers to questions under oath within 30 days of your receipt of this subpoena and order.

21 04 402 4511

If you have any questions, please contact me at (202) 219-3690.

Sincerely,



Nancy E. Bell  
Attorney

Enclosure  
Subpoena and Order

21-04-402-4512

**BEFORE THE FEDERAL ELECTION COMMISSION**

In the Matter of

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MUR 4594

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**SUBPOENA TO PRODUCE DOCUMENTS**  
**ORDER TO SUBMIT WRITTEN ANSWERS**

TO: Frank F. Fasi  
c/o David F. Fasi, Esq.  
Winer & Meheula  
Pali Palms Plaza  
970 North Kalaheo Ave., Suite A-300  
Kailua, Hawaii 96734

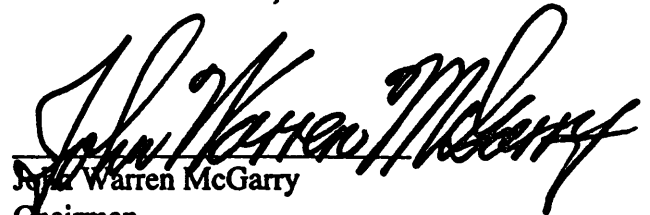
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.


21.04.402.4513

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his  
hand in Washington, D.C., on this *17th* day of *October*, 1997.

For the Commission,

  
John Warren McGarry  
Chairman

ATTEST:

*for*   
Marjorie W. Emmons  
Secretary to the Commission

Attachment  
Instructions/Definitions  
Interrogatories  
Document Requests

21-04-402-4544

### **INSTRUCTIONS**

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Documents previously produced in response to the Federal Election Commission's Subpoena To Produce Documents and Order to Submit Written Answers dated December 6, 1996 should not be resubmitted in response to these interrogatories and request for production of documents. These items should be listed and described in sufficient detail.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1984 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

21.04.402.4515

### **DEFINITIONS**

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"CAL" shall mean China Airlines, Ltd., or any persons associated with and/or owned in part and/or owned in whole by China Airlines, Ltd.

"Fasi" shall mean Friends for Fasi, Frank F. Fasi, or any other persons associated with Friends of Fasi and/or Frank F. Fasi.

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

21-04-402-4516

**INTERROGATORIES**

1. Give your residential address, social security number, place of employment, title, and job description.
2. For each year from 1984 through 1996, indicate the amount of space, in square feet, occupied at the Cultural Plaza by Fasi, the monthly amount paid for the space, and the source(s) of payment (breakdown by month if necessary).
3. Has Fasi ever received any funds and/or any other financial support, including but not limited to guarantees, from CAL. If so, for each instance of funds and/or other financial support being received:
  - a. identify the type;
  - a. state the amounts;
  - b. state the dates of receipt; and,
  - c. indicate the persons who transmitted the funds and/or financial support.
4. Has Fasi ever received any funds and/or any other financial support from Longevity. If so,
  - a. state the amounts and/or other financial support received;
  - b. state the dates of receipt; and,
  - c. indicate the persons who transmitted the funds and/or financial support.
5. Indicate whether you have ever had any contact, oral or written, with the following individuals: Louis C.L. Chang, Karl C.P. Wang, Maybelle Pang, and/or Hsu Chun-I. If so, for each individual
  - a. indicate the nature, date, and length of each contact;
  - b. describe the subject matter of any written and/or oral communication; and,
  - c. state in what capacity the individual was acting when he/she communicated with you.

21-04-402-1517

**REQUEST FOR DOCUMENTS**

**1. Provide all documents in your possession:**

- a. relating to the leasing of space at the Chinatown Cultural Plaza Shopping Center ("Cultural Plaza") by Fasi.**
- b. relating to CAL's involvement with Fasi.**
- c. relating to Longevity's involvement with Fasi.**

21-014-1402-4518